

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION**

LINDA L. FORDHAM,)
vs. Plaintiff,) Case No. 4:18-cv-00102-JTM-APR
HERITAGE ACCEPTANCE)
CORPORATION,)
Defendant.)

AGREED MOTION FOR EXTENSION OF TIME

Defendant Heritage Acceptance Corporation (the “Defendant”) hereby moves for an enlargement of time up to and including March 25, 2019 to answer or otherwise respond to the *Complaint* (the “Complaint”) filed by the Plaintiff Linda L. Fordham (the “Plaintiff”) in the above-captioned proceeding (the “Case”), and in support thereof respectfully states as follows:

1. Defendant’s response to the Complaint is currently due February 21, 2019, and said time has not yet expired.
2. The parties are engaging in some informal discovery and respectfully request that the Court enlarge Defendant’s deadline to answer or otherwise respond to the Complaint to and including March 25, 2019, to allow the parties’ time to explore settlement.
3. Plaintiff’s counsel has agreed to a thirty (30) day enlargement of time, up to and including March 25, 2019,¹ for Defendant to answer or otherwise respond to the Complaint.
4. The granting of the relief sought in this Motion will not unduly delay this action nor serve to prejudice the Plaintiff.

¹ The 30th day fell on Saturday, March 23, 2019. Pursuant to the F.R.C.P., I rounded to the following Monday, March 25, 2019.

5. This motion is not dilatory in motive nor designed to delay the resolution of this proceeding.

WHEREFORE, Defendant respectfully requests an extension of time, up to and including March 25, 2019, to answer or otherwise respond to the Complaint and for all other and further relief that is just and proper.

Date: February 12, 2019

Respectfully submitted,

/s/ Annette England

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*Attorneys for Defendant,
Heritage Acceptance Corporation*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically this 12th day of February, 2019. Notice of this filing will be sent to all parties registered to receive such notice by operation of the Court's electronic filing system. I hereby further certify that I caused a copy of the foregoing to be served via U.S. Mail, First Class, Postage Pre-Paid upon parties that are not registered to receive notice by operation of the Court's electronic filing system at their respective addresses listed on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Annette England

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